

Honorable Benjamin H. Settle

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT TACOMA

NORTHWEST SCHOOL OF SAFETY, a  
Washington sole proprietorship, PUGET  
SOUND SECURITY, INC., a Washington  
corporation, PACIFICA NORTHWEST  
ASSOCIATION OF INVESTIGATORS, INC.,  
a Washington corporation, FIREARMS  
ACADEMY OF SEATTLE, INC., a  
Washington corporation, DARRYL LEE, XEE  
DEL REAL, JOE WALDRON, GENE  
HOFFMAN, ANDREW GOTTLIEB, ALAN  
GOTTLIEB, GOTTLIEB FAMILY  
REVOCABLE LIVING TRUST, a Washington  
trust, and SECOND AMENDMENT  
FOUNDATION, a non-profit organization,

Plaintiffs,

v.

BOB FERGUSON, Attorney General of  
Washington (in his official capacity),  
WASHINGTON ATTORNEY GENERAL'S  
OFFICE, and JOHN R. BATISTE, Chief of the  
Washington State Patrol (in his official  
capacity), and DOES I-V,

Defendants.

No. 3:14-cv-6026 BHS

DECLARATION OF TARA PAONE IN  
SUPPORT OF CHERYL STUMBO,  
WASHINGTON ALLIANCE FOR GUN  
RESPONSIBILITY, AND  
EVERYTOWN FOR GUN SAFETY  
ACTION FUND FOR I-594'S MOTION  
TO INTERVENE AS DEFENDANTS

DECLARATION OF TARA PAONE IN SUPPORT OF  
STUMBO, WAGR, AND EVERYTOWN'S MOTION TO  
INTERVENE - 1

Case No. 3:14-cv-6026 BHS

20085 00004 eb135g073x.002

PACIFICA LAW GROUP LLP  
1191 SECOND AVENUE  
SUITE 2000  
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TELEPHONE: (206) 245.1700  
FACSIMILE: (206) 245.17500

1 I, Tara Paone, declare as follows:

2 1. I am over the age of 18, am competent to testify, and offer this declaration based  
3 on my personal knowledge.

4 2. I am the President of Everytown for Gun Safety Action Fund for I-594  
5 (“Everytown for I-594”). Everytown for I-594 is a Washington State ballot committee registered  
6 with the Washington State Public Disclosure Commission and established to support passage of  
7 Initiative 594.

8 3. Everytown for I-594 was formed in July 2014 by Everytown for Gun Safety  
9 Action Fund, the nation’s largest gun violence prevention organization, which fights for public  
10 safety measures that both respect the Second Amendment and improve public safety.

11 4. Everytown for I-594 was formed in order to provide 45,000 grassroots supporters  
12 and 27 mayors in Washington State an avenue to help pass I-594 and save lives by requiring all  
13 Washingtonians to undergo the same background check when buying a gun.

14 5. Everytown for I-594 worked closely with WAGR and Ms. Stumbo in  
15 spearheading the campaign to pass I-594, collecting funds and in-kind donations to support the  
16 campaign, enlist grassroots support, and mobilize voters. Everytown for I-594 engaged  
17 Washington residents by knocking on doors and making thousands of phone calls; in the final  
18 three weeks of the campaign alone, the committee supported more than 300 volunteer shifts, and  
19 generated more than 15,000 total canvassing attempts, including phone calls and door knocks.  
20

21 I declare under penalty of perjury of the laws of the State of Washington that the  
22 foregoing is true and correct.  
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DECLARATION OF TARA PAONE IN SUPPORT OF  
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INTERVENE - 2

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1 DATED this 20 day of February, 2015, signed in New York, New York

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3 Tara Paone  
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DECLARATION OF TARA PAONE IN SUPPORT OF  
STUMBO, WAGR, AND EVERYTOWN'S MOTION TO  
INTERVENE - 3

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 23rd day of February, 2015, I electronically filed the foregoing document with the United States District Court ECF system, which will send notification of such filing to the following:

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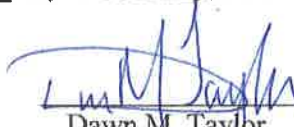
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*Attorneys for Defendants*

Signed at Seattle, Washington this 23rd day of February, 2015.

  
Dawn M. Taylor

DECLARATION OF TARA PAONE IN SUPPORT OF  
STUMBO, WAGR, AND EVERYTOWN'S MOTION TO  
INTERVENE - 4

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